

November 17, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554
SENT VIA EMAIL

**Ex Parte Meeting with FCC Chairman Tom Wheeler's Special Counsel On November 15th
Regarding Comcast/ Time Warner Proposed Merger**

Dear Ms. Dortch

On November 15th 2014, ten minority church, minority small business, and nonprofit leaders in California, many of whom represent national constituencies, met with Gigi Sohn, the Chairman's Special Counsel for External Affairs, to discuss the proposed Comcast/ Time Warner merger. The group was led by the National Asian American Coalition, the LA Latino Chamber of Commerce, the AME churches under the leadership of COR Church, and the leadership of the National Hispanic Leadership Conference, representing 40,000 Latino Evangelical churches, as well as other groups working with the aforementioned organizations. This included leadership from the Assembly of God Churches, the Jesse Miranda Leadership Center, the African Americans for Economic Justice, and the Vietnamese/Laotian Alliance for Economic Justice. All these groups are part of the newly formed National Diversity Coalition. They raised the following points:

- 1) They met with DOJ's Antitrust Assistant Attorney General William Baer and senior staff on November 13th regarding the Comcast/Time Warner merger. They expressed their concerns about the adverse impact on consumers in terms of pricing and future competition. In addition, they discussed that the condition for the merger being approved needed to include enhancing diversity and competition among Black networks/stations, Latino network/ stations, and creating an opportunity for a national Pan-Asian American network. They discussed this partly in the context of their intervention before the California Public Utilities Commission, which has a strong and commendable record of recognizing minority and underserved community public interest issues.
- 2) Specifically, they discussed why the proposed merger would not be in the public interest, would affect other potential mergers, [AT&T/ DirecTV], and failed to provide cost savings to low/moderate income consumers and could enhance the probability of future price increases.
- 3) Existing major Hispanic networks, including Telemundo, have failed to address the interests of the majority of our nation's 60 million Latinos, including young Latinos, second and third-generation Latinos and Latinas. We urged that if a merger were permitted, a key condition should

be major efforts to help create at least one additional profitable, competitive, and innovative national Latino network

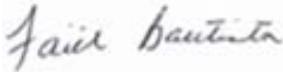
4) Discussed similar problems as to the nation's Black community of 45 million and the need, if this merger was approved, for a public interest provision to create and stimulate an alternative Black network that could address the essential concerns and interests of an upwardly mobile Black community

5) Similarly, we discussed the need to create a national voice for the Pan-Asian community of 20 million through efforts led by the NAAC to create a national Pan-Asian American network, since at present all Asian American stations and networks appeal to only their narrow sub-ethnic audiences.

6) Discussed the benefits of a very careful review of the proposed merger in the context of the CPUC's opportunities to have community groups enforce full discovery, hold public and evidentiary hearings and maximize public interest benefits to underserved and minority communities. This included appropriate extensions of time to enable the CPUC to issue a timely decision that would provide adequate time for the FCC to consider the CPUC's actions and recommendations.

7) We discussed the requested public hearings by the FCC should be similar to those held by in the past by CPUC and other federal agencies, and should include at least one hearing in Los Angeles (home to the largest number of Latino and Asian American consumers in the nation).

Most sincerely,



Faith Bautista
President & CEO
National Asian American Coalition

Cc: Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Mike O'Reilly
Marisa Blancarte
Walter Ulloa
Gil Vasquez